

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ETHLOKIA PLUMBER, *ex rel.* K.W.

Plaintiffs,

v.

HARRIS COUNTY DEPARTMENT
OF EDUCATION,

Defendant.

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CIVIL ACTION NO. 4:20-CV-00672

Declaration of Yvonnilda Muñiz

1. I have experienced difficulty litigating this case due to my health issues and impacts of the COVID-19 pandemic.
2. On October 5, 2020, I emailed counsel requesting an extension of time for submission of expert reports due to difficulty obtaining medical records because of COVID-19 as well as my health issues. Att. A, Oct. 5, 2020 Email to M. Goins.
3. In addition to written communication, I have spoken with Melissa Goins on multiple occasions, and informed her that my health issues have impacted my ability to litigate this case.
4. I have also informed Ms. Goins that my client has experienced difficulty obtaining medical records due to COVID. My client was not permitted to visit offices in person to make requests or follow up on records requests after they had been made.
5. Delays in the postal system also interfered with the ability to obtain medical records. Just last week I received a copy of the medical records postmarked December 2, 2020.
6. I produced medical records to Defendant as I obtained them. Att. B., Oct. 30, 2020 Email to M. Goins and E. Nichols.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Austin, Texas, on March 1, 2021.

/s/Yvonnilda Muñiz
Yvonnilda Muñiz

EXHIBIT A - 001

ATTACHMENT A

From: Yvonnilda Muniz <ygmuniz@outlook.com>
Subject: Ethlokia Plumber/K.W. v. HCDE
Date: October 5, 2020 at 12:20:06 PM CDT
To: Melissa Goins <mgoins@kbslawgroup.com>, Erik Nichols
<enichols@kbslawgroup.com>

Melissa -

Tomorrow is the deadline for me to submit expert reports. I am writing to see if you all agree or are opposed to an extension to that deadline. I will agree to an equal extension of time for you all to submit expert reports. I would like to request a months extension. The reasons I will offer are my health (I am trying a new medication prescribed by the specialist but need time to see if it will work) and the difficulty to get records because of COVID. Do you all agree?

Yvonnilda
Yvonnilda Muñiz

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ATT. A -001

ATTACHMENT B

From: Yvonnilda Muniz <ygmuniz@outlook.com>
Subject: Kenneth W./HCDE
Date: October 30, 2020 at 12:16:33 PM CDT
To: Melissa Goins <mgoins@kbslawgroup.com>, Erik Nichols
<enichols@kbslawgroup.com>

Melissa and Erik -

I have uploaded the medical records from Baylor St. Lukes in the Dropbox folder.

You should have received an email from Dropbox alerting you to the addition.

I still have not receive the medical records from Texas Children's Hospital. They claim to have sent them twice. I'll call them again to check on the status of those records.

Let me know if you have any questions.

Yvonnilda
Yvonnilda Muñiz

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ATT. B - 001